62

THE PORT AUTHORITY OF NEW YORK AND NEW JERSEY — Memorandum

To: Frank Boyce, Asbestos Project Coordinator, World Trade Center
From: Philip A. Taylor
Date: August 8, 1988
Subject: WTC - 43RD FLOOR, DEAN WITTER REYNOLDS RENOVATION: TAA 3491-WTC 490.045

Copy to: K. Apgar, J.E. Davison, E. McNeirny, J. Mullen, J. Panebianco, H.R. Pool, Jr., L. Sanchez, A. Savas

In reference to the above Tenant Alteration Application, Dean Witter Reynolds has contracted Hesco Environmental Services to abate the kitchen exhaust asbestos duct work insulation along the north half of the floor. Hesco's submittal package has proposed the enclosure and encapsulation of approximately 650 square feet of the insulation through the use of Certane 2000; a bridging encapsulant sprayed on to the asbestos containing material.

The United States Environmental Protection Agency's (USEPA) publication, "Guidance for Controlling Asbestos Containing Materials in Buildings" (EPA 560/5-85-024 June 1985), states the following:

Section 3.3.2 -

"Enclosure and encapsulation are temporary solutions to be implemented in special circumstances."

Table 3 -

Enclosure and encapsulation are considered inappropriate if the asbestos material is damaged.

The duct work in question on the 43rd floor contains numerous areas where the insulation material is damaged.

Section 5.1.2. -

Defines an enclosure system as impact resistant walls and/or ceiling constructed of "Gypsum panels, tongue and glove boards, and boards with spline joints..."

The application of Certane 2000 alone does not meet USEPA guidelines and in this instance, should not be considered as a method of abatement.

Section 4.2.1.3 -

An operations and maintenance program should be initiated and continued until the asbestos is removed, with inspections at least monthly.

It is the opinion of the Environmental Management Division, in accordance with the referenced USEPA guidance document, that enclosure and encapsulation are temporary measures of asbestos control.

The Environmental Management Division recommends that the asbestos insulation material on the duct work in the subject work area be removed, rather than encapsulated or enclosed.

If you have any questions, please contact me at PATHside (201)-963-7487.

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